



WW Engineering & Science

A Summit Company

February 11, 1993

Mary Beth Novy, RPM
U.S. Environmental Protection Agency
77 West Jackson Blvd., HSRW-6J
Chicago, IL 60604



RE: Albion-Sheridan Township Landfill (WA 11-5LAN)
Albion, Michigan

Dear Mary Beth:

I received a copy of the December 21, 1992 memorandum that Robert Delaney, MDNR, sent to Gene Hall, MDNR. I would like to take this opportunity to respond to several of the statements made in the MDNR memorandum.

This "cluster of drums" was initially discovered by the WWES geophysicist during the October 1992 magnetometer survey. It is my understanding that on November 10, 1992, the WWES geologist showed the MDNR geologist and project manager this "cluster" during a meeting at the site.

This "cluster" is the sole reason why we installed LF02 where we did. Three waste samples were collected from this particular boring for organic and inorganic analyses. We are currently waiting for the analytical results. A leachate well, screened at the base of the landfill, was installed at this location. Unfortunately, the leachate well was dry. We are not attempting to avoid the issue of drums, indeed by placing the well where we did, we are addressing the issue head on.

In the second paragraph of the memo, it is stated, "EPA has been reluctant to do a magnetometer survey of the entire site, as we understand it, because of the problems encountered at the Metamora Landfill." As WWES has previously stated in our November 25, 1992 letter to you, there are obvious differences in site conditions and background information for the Metamora Site and the Albion Site that have direct implication on the success of a site-wide magnetometer survey. The Metamora survey was used to simply confirm witness information and to semi-quantitatively estimate the number of drums present. With regard to the Albion Site, we do not have the credible historical record to warrant a site-wide magnetometer survey.

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In the fourth paragraph of the memo, it is stated, "The bedrock is highly fractured at this site and is in direct connection to the City of Albion water supply." We do not have the evidence to suggest that at this time. If the MDNR has additional evidence that we are not aware of, I would certainly appreciate if they would share it with us to further enhance our investigation.

We have not avoided the use of this important technology. Indeed, we have performed the magnetometer survey agreed upon by the MDNR and U.S. EPA in our September 9, 1992 on-site meeting and in accordance with the work plan the MDNR received on October 14, 1992.

At one point during the meeting on September 9, 1992, the MDNR geophysicist indicated that they could possibly perform the site-wide magnetometer survey. I believe that he made this statement after he was made aware that the State of Michigan owns a large portion of this landfill. We would be happy to share our magnetometer survey data collected to date to supplement any additional surveys.

As we stated in our November 25, 1992 letter, we will assume that the site investigation will progress as described in the Approved Work Plan.

Sincerely yours,

WW ENGINEERING & SCIENCE, INC.
Environmental Services Division



Elizabeth M. Uhl
Site Project Manager

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